

April 11, 2017

MEMORANDUM

SUBJECT: Office of Inspector General Hotline Complaint 2017-0182

FROM: Francesca Grifo
EPA Scientific Integrity Official

TO: Arthur Elkins
EPA Inspector General

You recently referred OIG General Hotline Complaint 2017-0182, an allegation of a violation of the EPA Scientific Integrity Policy by the Administrator to me¹. I in turn have conducted an inquiry in accordance with our policy for resolving allegations of loss of scientific integrity² and our Coordination Procedures between the Scientific Integrity Official and the Office of the Inspector General³. In this process we reviewed the Administrator's comments and the subsequent allegation in the context of the EPA Scientific Integrity Policy. We focused our review on the following text included in the EPA Scientific Integrity Policy⁴:

When an Agency employee substantively engaged in the science informing an Agency policy decision disagrees with the scientific data, scientific interpretations, or scientific conclusions that will be relied upon for said Agency decision, the employee is encouraged to express that opinion...

The Scientific Integrity Policy applies to all EPA employees, contractors, grantees, collaborators and student volunteers, including political appointees. The freedom to express one's opinion is fundamental to EPA's Scientific Integrity Policy even, and especially when, that point of view might be controversial. Expressing an opinion is not a violation of the EPA Scientific Integrity Policy and, as such, the Administrator's statement does not violate the Agency's Scientific Integrity Policy. The Policy encourages open dialogue among scientists and managers when there are differences of opinion. The Administrator's statement was just that – a statement. It was not associated with a policy decision and did not suppress or alter Agency scientific findings.

Our Scientific Integrity Policy is designed to promote a culture of scientific integrity. The scientific information and processes relied upon in decision making are enhanced by our focus on transparency, open communication, our firm commitment to evidence, honest investigation, and a robust culture of scientific inquiry and discussion.

Thank you for your referral of this matter. I hope this information is useful as you move to conclude this matter.

cc: Members of the Scientific Integrity Committee
Robert Kavlock, EPA Science Advisor

¹ <https://www.docdroid.net/HvDdJZs/sierra-club-scientific-integrity-complaint-3-14-17.pdf.html> (last visited 4/4/17)

² https://www.epa.gov/sites/production/files/2015-04/documents/annual_report_scientific_integrity_2014_final_pages.pdf (last visited 4/4/17)

³ https://intranet.ord.epa.gov/sites/default/files/media/oig-scio_coordination_procedures_final.pdf (last visited 4/4/17)

⁴ https://www.epa.gov/sites/production/files/2014-02/documents/scientific_integrity_policy_2012.pdf (last visited 4/4/17)